



July 11, 2021

Carol A. (Annie) Petsonk
Acting Assistant Secretary for Aviation and International Affairs
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2022-0071

Dear Assistant Secretary Petsonk:

The Regional Airline Association ("RAA") appreciates the opportunity to submit comments to the U.S. Department of Transportation ("Department" or "DOT") in support of the June 17, 2022 application of SkyWest Charter, LLC ("SWC") for a Commuter Air Carrier Authorization. The request is particularly relevant as it would allow SWC to provide underserved communities with frequent jet service and ready access to the national transportation system when small community air service is in crisis under a real and growing pilot shortage¹.

It is of the utmost interest to RAA that small communities continue to receive safe and strong air service, with adequate destinations and frequency to enable them to take part in our nation's continuing recovery.

Specifically, we support SWC's application for the following reasons:

I. SWC's application is routine and legal.

Regulated entities need reliable, evenly applied rules that allow for predictability in the conducting of business. Regulated entities must be confident the Department will apply the law equally and fairly. The type of service proposed by SWC is already in existence in other markets and numerous communities currently receive air service via scheduled public charter flights.

In fact, the Department itself frequently authorizes this service in conjunction with the Alternate Essential Air Service ("AEAS") program. Congress established AEAS as a pilot program in Vision 100, Century of Aviation Reauthorization Act ("Vision 100") to provide communities with an alternative to traditional EAS-type service. The stated intention of Congress was to provide smaller communities with more options when determining what service best satisfies their needs. These options include more frequent service with smaller aircraft, on-demand air taxi service or scheduled public charter flights, scheduled or on-demand surface transportation, regionalized air service, or purchasing an aircraft.

Under the Department of Transportation's supervision, this service has been provided by scheduled public charter flights. For example, one public charter company, Contour, regularly provides scheduled public charter service as part of the AEAS program, with an interline

¹ <https://www.raa.org/growing-pilot-shortage-threatens-small-community-air-service-collapse/>

arrangement with American Airlines. Communities served in this manner include Muscle Shoals, AL; Page, AZ, Crescent City, CA, Macon, GA, Greenville, MS, Tupelo, MS, Plattsburgh, NY, Ogdensburg, NY, Beckley, WV, and Parkersburg/Marietta, OH².

Other communities receive air service through regularly scheduled public charter flights without subsidy. For example, Concord, CA, has scheduled public charter service operated by JSX with codeshare partner JetBlue.

Because this type of service is already approved by the Department and is being used in other markets, and in view of the Department's obligation to apply the regulations evenly, RAA strongly supports SWC's proposal and urges that the authority requested be granted.

II. Small Community Air Service is in Crisis.

Compared with 2019, 71% of our nation's airports (315 airports) have lost some degree of air service. The average loss among these communities was 22.4%, or the equivalent of more than one in five flights. While communities of all sizes have lost air service, losses have disproportionately harmed smaller communities. While 315 airports have lost service, 11% of Large and Medium hub airports have experienced loss. By contrast, 59% of the nation's Small, Nonhub and Nonprimary hub airports have experienced loss³. These trends are not unique to the post pandemic era; in 2009, 582 airports had scheduled, commercial airline service and by 2018, that number has fallen to 567⁴. This loss of air service took place as airlines struggled to meet demand under the earlier influence of a well-documented pilot shortage⁵.

III. The Alternate to Air Service is More Highway Traffic.

Without safe, reliable air service, passengers in smaller communities will be forced to make their journeys on our highways, where traffic deaths have already reached crisis levels. The National Highway Traffic Safety Administration (NHTSA) released preliminary data from the Federal Highway Administration in May, showing that vehicle miles traveled in 2021 increased by about 11.2%, as compared to 2020⁶. At the same time, vehicle traffic fatalities rose by a similar rate at 10.5%.

This dramatic increase from the prior year marked the single highest number of fatalities since 2005 and the largest annual percentage increase in the Fatality Analysis Reporting System's history. As an existing pilot shortage stands to worsen, more small communities will lose air service, relegating higher numbers of passengers to buses and cars on our highways.

² https://www.transportation.gov/Subsidized_EAS_report48states_HI_PR_Jun2022

³ OAG Analyser Tool: Percentage change in air service by NPIAS Category Jan-Jun 2019 vs. Jan-June 2022.

⁴ Analysis of OAG Published Schedules.

⁵ <https://investors.boeing.com/investors/investor-news/press-release-details/2018/Boeing-Forecasts-Unprecedented-20-Year-Pilot-Demand-as-Operators-Face-Pilot-Supply-Challenges/default.aspx>

⁶ <https://www.nhtsa.gov/press-releases/early-estimate-2021-traffic-fatalities>

The Regional Airline Association supports the application of SkyWest Charter, LLC for authority to operate as a Commuter Air Carrier. As described above, the type of service SWC has proposed is already being provided, including in EAS markets. The Department has an obligation to apply its rules evenly, consistently and fairly, treating applicants in the same manner as others in similar conditions and circumstances.

Thank you for your consideration of our comments. If we may be of additional service or provide clarifying information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Faye Malarkey Black". The signature is written in a cursive, flowing style.

Faye Malarkey Black
President & CEO